

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

3 <sup>RD</sup> AVE SW LLC and JHA FAMILY LLC,	)	
	)	
Plaintiffs,	)	No. 2:24-cv-00552-JCC
	)	
vs.	)	<b>JOINT STATUS REPORT</b>
	)	
RYAN JIMENEZ, ODIN PROPERTY TAX	)	
ADVOCATES LLC, a Colorado limited liability	)	
company, and KING COUNTY, a political	)	
subdivision,	)	
Defendants.	)	
	)	

As directed by the Court's September 20, 2024, Minute Order Setting Initial Case Management Dates (Dkt. 14), the parties met and conferred telephonically on October 11, 2024, and hereby submit this Joint Status Report.

1. Discovery Plan pursuant to Fed. R. Civ. P. 26(f)(3).

A. Initial Disclosures: While the parties agreed that initial disclosures would be exchanged by November 8, 2024, pursuant to the Court's September 20, 2024, Minute Order Setting Initial Case Management Dates (Dkt. 14), the Plaintiff now requests that his deadline be extended to November 22, 2024 because Plaintiff's counsel is in trial until end of November. The Defendants all exchanged their initial

disclosures by November 8, 2024.

B. Subject, timing and potential phasing of discovery: Discovery will be needed regarding liability and damages issues. The parties agree there is no need for phasing of discovery. The parties propose a discovery deadline, including depositions, of December 31, 2025.

C. Electronically stored information: The parties foresee a need to exchange ESI because the defendants likely have discovery stored in electronic format.

D. Privilege issues: The parties will comply with applicable law regarding claims of privilege or confidentiality. At this time, the parties do not anticipate any unusual privilege issues.

E. Proposed limitation on discovery: The parties do not have any suggested limitations at this time.

F. The need for any discovery related orders: Not at this time.

2. Estimated days needed for trial: 7 court days.

3. Date by which case will be ready for trial: March 1, 2026, or any day thereafter.

4. Whether the parties intend to mediate per LCR 39.1: Mediation will be completed by September 30, 2025.

DATED this 15<sup>th</sup> day of November, 2024.

LEESA MANION (she/her)  
King County Prosecuting Attorney

By: /s/ John R. Zeldenrust  
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**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on November 15, 2024, I electronically filed the foregoing *Joint Status Report* with the Clerk of the Court using the using the CM/ECF E-filing system, which will send notification of such filing to the following:

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*Attorney for Defendant Ryan Jimenez*

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 15<sup>th</sup> day of November, 2024.

s/Karen Richardson

Karen Richardson  
Civil Litigation – Paralegal II  
King County Prosecuting Attorney's Office